

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FOUR HUNDRED FIFTIETH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO TO CLAIMS ASSERTED AGAINST THE INCORRECT DEBTOR

Upon the *Four Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Claims Asserted Against the Incorrect Debtor* [ECF No. 20781] (the “Four Hundred Fiftieth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), dated May 13, 2022, for entry of an order reclassifying certain

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Fiftieth Omnibus Objection.

claims filed against the Commonwealth, as more fully set forth in the Four Hundred Fiftieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Fiftieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Fiftieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Fiftieth Omnibus Objection having improperly identified the Commonwealth as obligor, when such claims are properly asserted, if at all, against the Puerto Rico Electric Power Authority (“PREPA”); and the Court having determined that the relief sought in the Four Hundred Fiftieth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Fiftieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Fiftieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Fiftieth Omnibus Objection (the “Reclassified Claims”) are hereby reclassified to be claims asserted against the Title III debtor indicated in the column titled “Corrected” in Exhibit A; and it is further

ORDERED that the Debtors’ right to object to the Reclassified Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed, in the official claims register in the PROMESA cases, to move the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Fiftieth Omnibus Objection from the Commonwealth Title III Case to PREPA’s Title III Case (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) identified in the column titled “Corrected” in Exhibit A to the Four Hundred Fiftieth Omnibus Objection; and it is further

ORDERED that this Order resolves Docket Entry No. ECF No. 20781 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Fiftieth Omnibus Objection

Exhibit A Page 6 of 6

Four Hundred Fiftieth Omnibus Objection

Exhibit A - Claims to Be Reclassified

ASSERTEDCORRECTED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	COTTY PABON, CARMEN R P.O. BOX 33 ADJUNTAS, PR 00601	134467-1	Commonwealth of Puerto Rico Commonwealth of Puerto Rico	503(b)(9) Secured	Undetermined* Undetermined*	Puerto Rico Electric Power Authority Puerto Rico Electric Power Authority	503(b)(9) Secured	Undetermined* Undetermined*
				Subtotal	Undetermined*		Subtotal	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability for excessive bills would reside, if at all, under Puerto Rico Electric Power Authority. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.								
2	LOPEZ FONRODONA, CECILIO HC-09 BOX 4365 SABANA GRANDE, PR 00637	23198-1	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Electric Power Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under Puerto Rico Electric Power Authority. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.								
3	RIVERA ALEMAN, NORMAN P.O. BOX 33 ADJUNTAS, PR 00601	131886-1	Commonwealth of Puerto Rico Commonwealth of Puerto Rico	503(b)(9) Secured	Undetermined* Undetermined*	Puerto Rico Electric Power Authority Puerto Rico Electric Power Authority	503(b)(9) Secured	Undetermined* Undetermined*
				Subtotal	Undetermined*		Subtotal	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability for excessive bills would reside, if at all, under Puerto Rico Electric Power Authority. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.								
	TOTAL				Undetermined*	TOTAL		Undetermined*

*Indicates claim contains unliquidated and/or undetermined amounts